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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF TEXAS  
3                   SHERMAN DIVISION  
4  
5

6 USA FOOTBALL, INC.,

7                   Plaintiff,

8 vs.

Civil Action Nos.

9                   4:23-cv-00465-ALM and

10 FFWCT, LLC; USA FLAG, LLC;       4:23-cv-00516-ALM

11 AND TRAVIS BURNETT,

12                   Defendants.  
13 \_\_\_\_\_/

14  
15  
16  
17                   The video-recorded deposition of  
18 JAMIE RILEY and USA Football Designee, was  
19 held on Thursday, April 4, 2024, commencing  
20 at 10:04 a.m., via Zoom Web Conference,  
21 before Christine A. Gonzalez, CSR, RPR, a  
22 Notary Public.  
23

24 Stenographically Reported By:

25 Christine A. Gonzalez, CSR, RPR

<div>Page 2</div> <div>1 APPEARANCES:</div> <div>2 (All Appearances Via Web Conference.)</div> <div>3</div> <div>4 ON BEHALF OF THE PLAINTIFF:</div> <div>5 ANNE K. RICCHIUTO, ESQUIRE</div> <div>6 ASHLEY HODGES, ESQUIRE</div> <div>7 Peele Law Group</div> <div>8 49 Boone Village</div> <div>9 Box 299</div> <div>10 Zionsville, Indiana 46077</div> <div>11 202.964.4500</div> <div>12 aricchiuto@peeelawgroup.com</div> <div>13</div> <div>14 ON BEHALF OF THE DEFENDANTS:</div> <div>15 MARK D. NIELSEN, ESQUIRE</div> <div>16 TAYLOR HARRIS, ESQUIRE</div> <div>17 Scheef &amp; Stone, LLP</div> <div>18 2600 Network Boulevard, Suite 400</div> <div>19 Frisco, Texas 75034</div> <div>20 214.472.2100</div> <div>21 mark.nielsen@solidcounsel.com</div> <div>22</div> <div>23</div> <div>24 ALSO PRESENT: Bailey Wellman - Videographer</div> <div>25</div>	<div>Page 4</div> <div>1 INDEX</div> <div>2 Deposition of JAMIE RILEY</div> <div>3 April 4, 2024</div> <div>4</div> <div>5 Exhibit No. Marked</div> <div>6 Exhibit(s) Attached</div> <div>7 Exhibit 538 J. Scott Hallenbeck Transcript 94</div> <div>8 Excerpt</div> <div>9 Exhibit 539 FFWCT - USA Football, Inc., 109</div> <div>10 Event Collaboration Agreement</div> <div>11 USAFB Bates Nos. 0700-0708</div> <div>12 Exhibit 540 Confidentiality &amp; Nondisclosure 117</div> <div>13 Agreement</div> <div>14 Bates Nos. FFWCT000037-000038</div> <div>15 Exhibit 541 Consulting Services Agreement 118</div> <div>16 Bates Nos. USAFB215-223</div> <div>17 Exhibit 542 Defendants' First Amended 119</div> <div>18 Counterclaim</div> <div>19 Exhibit 543 Plaintiff USA Football, Inc.'s 120</div> <div>20 Answer to First Amended</div> <div>21 Counterclaim</div> <div>22 Exhibit 544 Plaintiff USA Football, Inc.'s 133</div> <div>23 Responses and Objections to</div> <div>24 Defendant FFWCT, LLC's First</div> <div>25 Set of Interrogatories</div>
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<p>1 INDEX Page 6</p> <p>2 Deposition of JAMIE RILEY</p> <p>3 April 4, 2024</p> <p>4</p> <p>5 Exhibit No. Marked</p> <p>6 Exhibit(s) Attached</p> <p>7 Exhibit 549 USA Football Article 182</p> <p>8 July 20, 2021</p> <p>9 Exhibit 550 Email String 190</p> <p>10 Bates Nos. USAFB371-400</p> <p>11</p> <p>12</p> <p>13 QUESTIONS INSTRUCTED NOT TO ANSWER</p> <p>14 Page 193, Line 23</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 8</p> <p>1 have Ashley Hodges from Peele Law Group for</p> <p>2 USA Football.</p> <p>3 Whereupon,</p> <p>4 JAMIE RILEY,</p> <p>5 called as a witness, having been first duly</p> <p>6 sworn to tell the truth, the whole truth, and nothing</p> <p>7 but the truth, was examined and testified as follows:</p> <p>8 - - -</p> <p>9 EXAMINATION</p> <p>10 - - -</p> <p>11 BY MR. NIELSEN:</p> <p>12 Q All right. Good morning, Ms. Riley.</p> <p>13 Thank you for being available today for your</p> <p>14 deposition, and I will be -- before we get really</p> <p>15 started with questions, let's just make sure we're</p> <p>16 all on the same page with how this goes, especially</p> <p>17 virtually.</p> <p>18 Have you ever had your deposition taken</p> <p>19 before?</p> <p>20 A No.</p> <p>21 Q Okay. So basically, what happens is</p> <p>22 I'm going to ask questions, you'll give me, you</p> <p>23 know, answers to the best of your ability and at</p> <p>24 times your counsel may object to my questions</p> <p>25 and -- do you understand that so far?</p>
<p>Page 7</p> <p>1 * * * * *</p> <p>2 THE VIDEOGRAPHER: Good morning. We</p> <p>3 are now on the record at 10:04 a.m. on</p> <p>4 Thursday, April 4th, 2024.</p> <p>5 This begins the videotaped deposition</p> <p>6 of Jamie Riley taken in the matter of</p> <p>7 USA Football verse FFWCT; USA Flag; Travis</p> <p>8 Burnett; Case No. 4:23-cv-00516-ALM.</p> <p>9 My name is Bailey Wellman, your remote</p> <p>10 videographer for today. Our court reporter</p> <p>11 is Christine Gonzalez. We are both</p> <p>12 representing Fortz Legal Support.</p> <p>13 As a courtesy, will everyone who is not</p> <p>14 speaking please mute your audio, remember to</p> <p>15 unmute your audio when you are ready to</p> <p>16 speak?</p> <p>17 Counsel, will you please state your</p> <p>18 name and who you represent, after which our</p> <p>19 court reporter will swear in the witness?</p> <p>20 MR. NIELSEN: Mark Nielsen representing</p> <p>21 FFWCT, et al.</p> <p>22 MR. HARRIS: Taylor Harris representing</p> <p>23 FFWCT, et al., as well.</p> <p>24 MS. RICCHIUTO: Anne Ricchiuto from</p> <p>25 Peele Law Group for USA Football, and we also</p>	<p>Page 9</p> <p>1 A Correct. Yes.</p> <p>2 Q Okay. And at times your counsel may,</p> <p>3 depending on my question, possibly instruct you not</p> <p>4 to answer questions, but typically, unless</p> <p>5 Ms. Ricchiuto affirmatively instructs you not to</p> <p>6 answer, you need to answer all of my questions to</p> <p>7 the best of your ability even if there is an</p> <p>8 objection.</p> <p>9 Do you understand that?</p> <p>10 A Yes.</p> <p>11 Q Okay. And because this is being taken</p> <p>12 down for a transcript, head nods, gestures, it's</p> <p>13 normal, you know, kind of part of our speech, but</p> <p>14 the court reporter can't really take those down, so</p> <p>15 let's try to do yeses and noes as much as possible.</p> <p>16 Okay?</p> <p>17 A Yes.</p> <p>18 Q And one of the things that's really</p> <p>19 important when we do this virtually is that you may</p> <p>20 have an answer before I'm completely done with my</p> <p>21 question or I may start asking a question before</p> <p>22 you're done with an answer, let's do our best not</p> <p>23 to interrupt each other so the court reporter can</p> <p>24 get everything down smoothly. Okay?</p> <p>25 A Got it.</p>

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1 **A Our USA Football trademark portfolio.**

2 BY MR. NIELSEN:

3 Q What's in that portfolio?

4 MS. RICCHIUTO: Same objection.

5 **A USA Football, USA -- sorry -- The One**  
 6 **Flag Championship, Rookie Tackle. We have a**  
 7 **full -- we have a full list of trademark, so...**

8 MR. NIELSEN: Okay. Ms. Reporter,  
 9 let's take this down. We are going to come  
 10 back to it, so let's not have it go too far  
 11 away, but let's take down Exhibit 536, which  
 12 was Tab 6, and if you would put up Tab 8, and  
 13 we'll mark that as 537.

14 And I'll represent for the record that  
 15 Tab 8 is a portion of Exhibit B, as in boy,  
 16 to the Complaint in the '516 action.

17 (Exhibit 537 was marked for purposes of  
 18 identification.)

19 BY MR. NIELSEN:

20 Q And Ms. Riley, feel free to look  
 21 through this and let me know when you're ready.

22 **A Yes, I'm ready.**

23 Q Does this table shown here, in the  
 24 first three pages of Exhibit B to the Complaint in  
 25 the '516 action, give you any further clarity on

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1 what "the Marks" may mean in paragraph 17 of the  
 2 Complaint?

3 **A Yeah. As I said, USA Football**  
 4 **trademarks.**

5 Q Okay. And this list here would at  
 6 least be part of that?

7 **A Correct.**

8 Q Are there any other trademarks that  
 9 USA Football has that it believes is part of this  
 10 case?

11 MS. RICCHIUTO: Object to the extent it  
 12 calls for --

13 BY MR. NIELSEN:

14 Q Other than what's on this list. Let me  
 15 clarify that.

16 **A As part of this case, these seem**  
 17 **appropriate.**

18 Q So going back to the question of  
 19 paragraph 17: What is the definition of "the  
 20 Marks," this Exhibit B table here would be the  
 21 definition in your mind; is that fair?

22 **A That is fair.**

23 MR. NIELSEN: Okay. Ms. Reporter, you  
 24 can take this down, please.

25 And let's put up Tab 6, Exhibit 536

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1 back up, please. And if Ms. Riley has  
 2 control, if you want to scroll this back up  
 3 to the top of the document, that would be  
 4 great. Perfect.

5 BY MR. NIELSEN:

6 Q And you recognize this as the Complaint  
 7 filed by USA Football against my clients, correct?

8 **A Correct.**

9 Q And I know in the list of topics there  
 10 was a topic that called out specific paragraph  
 11 numbers in this Complaint, so that's what I want to  
 12 do now is kind of work through that.

13 Ms. Riley, if you --

14 MR. NIELSEN: Oh, go ahead, Anne.

15 MS. RICCHIUTO: Sorry, Mark. Can we  
 16 just -- for clarification then, are these  
 17 next series of questions related to the  
 18 Complaint? Are these intended to be 30(b)(6)  
 19 questions?

20 MR. NIELSEN: The questions are the  
 21 questions.

22 MS. RICCHIUTO: Well --

23 MR. NIELSEN: I don't have to tell you  
 24 that. They're in our -- they're in our  
 25 notice and --

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1 MS. RICCHIUTO: There are things that  
 2 are in your notice, you can ask her on behalf  
 3 of the company, and things like where did she  
 4 go to college and what classes did she take,  
 5 I haven't been lodging this objection on  
 6 every question 'cause I'm actually not trying  
 7 to get in the way of your deposition, but I  
 8 do think that it's important that the record  
 9 is clear.

10 And so since you've -- the other way to  
 11 do it, Mark, is every single question, you've  
 12 got to say who you're -- in what capacity  
 13 you're asking.

14 MR. NIELSEN: I've never seen that  
 15 done, Anne. Never seen --

16 MS. RICCHIUTO: Well, right, because --  
 17 because most of the time people make some  
 18 logical assumptions --

19 MR. NIELSEN: All right. Let's move  
 20 on.

21 MS. RICCHIUTO: -- but I want to be  
 22 clear.

23 MR. NIELSEN: Let's move on. If I  
 24 mention --

25 MS. RICCHIUTO: -- lodge objection --

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1 (Overlapping speakers.)  
 2 STENOGRAPHIC REPORTER: Wait, wait,  
 3 wait. It's cutting both of you off. So I  
 4 heard let's move on. I heard, I think, an  
 5 objection or something.  
 6 MS. RICCHIUTO: I just said then I'll  
 7 lodge objections as appropriate going  
 8 forward. I thought I was going to make it  
 9 easier, but...  
 10 MR. NIELSEN: We'll talk about it off  
 11 the record at a break.  
 12 BY MR. NIELSEN:  
 13 Q Ms. Riley, can you scroll down to  
 14 paragraph 11, please? And please feel free to read  
 15 paragraph 11 to yourself and let me know when  
 16 you're ready.  
 17 A I'm ready.  
 18 Q When it says "USA Football operates  
 19 events across all disciplines of football..." --  
 20 I'm not going to read the rest of it -- what is  
 21 meant there by the word "operates"?  
 22 A We run and facilitate events.  
 23 Q And is there a difference between  
 24 running an event and facilitating an event?  
 25 A No.

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1 Q And does USA Football operate events in  
 2 connection with adult flag football?  
 3 A Yes.  
 4 Q And those are the events you mentioned  
 5 earlier. It was The One Championship, and this  
 6 year there's some qualifying events; is that  
 7 correct?  
 8 A Those are qualifying tournaments. We  
 9 also operate trials and training camps for adults  
 10 and competitions.  
 11 Q What competitions does USA Football  
 12 operate for adults besides The One Flag  
 13 Championship?  
 14 A Sure. We have operated events on  
 15 behalf of International Federation of American  
 16 Football for international competition with adults.  
 17 Q And when you say "operated," that's  
 18 USA Football operated it? It wasn't contracted out  
 19 to a third party?  
 20 A Correct.  
 21 Q How long has that -- has USA Football  
 22 been operating those adult events that you just  
 23 mentioned?  
 24 A Well, it varies on when the events are  
 25 happening through the International Federation of

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1 American Football. But as far as USA Football  
 2 specifically, almost every year depending upon the  
 3 discipline of the sport.  
 4 Q I should've asked it a little more  
 5 clearly.  
 6 To the best of your knowledge, how far  
 7 back does that go in terms of USA Football  
 8 operating those events?  
 9 A For adults?  
 10 Q Yes.  
 11 A Probably all the way back to 2005 or '6  
 12 relative, again, to the discipline of the sport.  
 13 Q And if you would be so kind to scroll  
 14 down to paragraph 19, which is also a topic in our  
 15 30(b)(6) notice, and go ahead and read that to  
 16 yourself and let me know when you're ready.  
 17 A I'm ready.  
 18 Q Did USA Football as an entity notify  
 19 Mr. Burnett at the time in 2017 that it considered  
 20 Mr. Burnett's intended use of the name and mark  
 21 USA Flag to be an infringement?  
 22 A Yes.  
 23 Q So the company itself did?  
 24 A Our CEO. Our CEO told Mr. Burnett.  
 25 Q And it says "at that time." Was that

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1 in 2017?  
 2 A I believe so, yes.  
 3 Q And any particular point in time during  
 4 2017 when this happened?  
 5 A It was during a meeting at our  
 6 USA Football offices.  
 7 Q Was that in July of 2017?  
 8 A I don't recall the actual month, but I  
 9 believe we started engaging with Mr. Burnett in  
 10 July of 2017 in a conversation.  
 11 Q And that took place at USA Football's  
 12 offices in Indianapolis?  
 13 A Yes.  
 14 Q Did you witness that?  
 15 A I don't believe I was in the room.  
 16 Q Then how do you know that that took  
 17 place?  
 18 MS. RICCHIUTO: Objection,  
 19 argumentative. This is a topic on which she  
 20 was to be prepared to testify, and she's  
 21 prepared to testify about this topic.  
 22 BY MR. NIELSEN:  
 23 Q Ms. Riley?  
 24 A How was I made aware; is that the  
 25 question?

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1 MR. NIELSEN: Ms. Videographer, if you  
2 could put up Tab 24, and we'll mark that as  
3 Exhibit 549.

4 And I will represent that this is  
5 Exhibit 26 to the Complaint in the '465  
6 action. And I will also represent that this  
7 the red underlines were added by us. They  
8 weren't in the original that you'all put up.

9 (Exhibit 549 was marked for purposes of  
10 identification.)

11 BY MR. NIELSEN:

12 Q And feel free to take a look at this,  
13 Ms. Riley.

14 A **Sure. Okay.**

15 Q Does this -- strike that.

16 Does this appear to be a press release  
17 by USA Football on the USAFootball.com website?

18 A **It appears to be. Yes.**

19 Q Have you seen this press release before  
20 today?

21 A **It's possible.**

22 Q Would you agree that this press release  
23 was dated July 20, 2021?

24 A **Yes.**

25 Q And in perusing it, would you agree

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1 **directly, no.**

2 Q Can you repeat that answer? I honestly  
3 didn't --

4 A **Not to my understanding. Sorry. I  
5 feel like I'm speaking loud. I may not speaking  
6 loud enough.**

7 **No, not to my understanding and  
8 definitely not to me directly.**

9 MR. NIELSEN: All right.

10 Ms. Videographer, you can take this down,  
11 please.

12 BY MR. NIELSEN:

13 Q Does USA Football believe that being  
14 the national governing body for flag football in  
15 the United States under the Ted Stevens Olympic and  
16 Amateur Sports Act is a right that USA Football  
17 possesses?

18 A **No. We are the governing body for the  
19 sport of football, all disciplines. And under the  
20 umbrella of being a member -- sole member of IFAF,  
21 we do have that right.**

22 As it relates to the USOPC and being  
23 certified as a national governing body, as I stated  
24 before, that can be an open application to anyone  
25 who would like to apply for that.

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1 that its context is flag football?

2 A **I'm sorry. What do you mean by  
3 "context is flag football"?**

4 Q Well, it's about a flag football event  
5 or situation, correct? It's not about tackle  
6 football or something else?

7 A **This particular press release seems to  
8 be about announcing our high performance and  
9 athletes and coach advisory committees on behalf --  
10 on behalf of flag football. Correct.**

11 Q And do you have any understanding in  
12 terms of whether this press release was issued  
13 after the USOPC asked USA Football not to use  
14 "national" in front of governing body?

15 A **My understanding is they did not tell  
16 us that until October of 2023. Up until that  
17 point, they have referenced us as a national  
18 governing body both in agreements and in emails, as  
19 I stated before.**

20 Q So before October of 2023, the  
21 US Olympic and Paralympic Committee had not asked  
22 USA Football not to use "national" in front of  
23 governing body in media press releases and things  
24 of that nature?

25 A **Not to my nature [sic]. Not to me**

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1 MR. NIELSEN: Something's amuck with my  
2 notes here. Let's go off the record for a  
3 minute.

4 THE VIDEOGRAPHER: Off the record at  
5 3:56 p.m.

6 (There was a brief recess taken from  
7 3:56 p.m. to 4:09 p.m.)

8 THE VIDEOGRAPHER: We are back on the  
9 record at 4:09 p.m.

10 BY MR. NIELSEN:

11 Q Ms. Riley, have you been involved in  
12 any communications with the NFL in the last three  
13 years in regard to flag football on behalf of  
14 USA Football?

15 A **Yeah.**

16 Q Have any of those conversations  
17 mentioned my clients?

18 A **No.**

19 Q Has anyone at USA Football told the NFL  
20 that USA Football was the national governing body  
21 for flag football in the US?

22 A **I believe we have used the term  
23 "national governing body" for the sport of  
24 football.**

25 Q With the NFL?



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1 **A Sure.**

2 Q Do you know to whom at the NFL  
3 USA Football has indicated that they were the  
4 national governing body for football, including  
5 flag football?

6 **A Could've been in -- with the  
7 NFL Foundation, with other departments as it  
8 relates to conversations and/or discussions around  
9 the sport.**

10 Q Any particular people at the NFL or  
11 NFL Foundation, as you said?

12 **A We often present to the NFL Foundation  
13 board and/or the executive director and her staff.**

14 Q And you mean the executive director of  
15 the NFL Foundation, correct?

16 **A Correct.**

17 Q And what's her name?

18 **A Alexia Gallagher.**

19 Q Do you know who is -- well, strike  
20 that.

21 **So is it your understanding then that  
22 USA Football has said in one way or the other to  
23 the NFL Foundation board that USA Football's the  
24 national governing body for football and flag  
25 football in the United States?**

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1 **A Yes, for football as a sport, not just  
2 flag football.**

3 Q But it would include flag football,  
4 correct?

5 **A Any discipline of the sport, correct.**

6 Q Do you know who is on the NFL  
7 Foundation board right now?

8 **A There -- the NFL Foundation board is  
9 made up of different NFL team club owners.**

10 Q Is it limited to team club owners?

11 **A I'm not positive on that. You'd have  
12 to ask them, but my experience has been with club  
13 owners.**

14 Q Has USA Football told Troy Vincent that  
15 you'all are the national governing body for  
16 football in the US?

17 **A I'm sure that has been bought up in  
18 different conversations or meetings. Yes.**

19 Q Has USA Football mentioned that it is  
20 the national governing body for football in the  
21 United States to Kimberly Fields?

22 **A Not that I'm aware of unless she was  
23 part of a meeting that it was mentioned, but I  
24 can't be specific if she was there.**

25 Q Has USA Football mentioned to

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1 Roman, R-O-M-A-N, Oben, O-B-E-N, that it is the  
2 national governing body for football in the  
3 United States?

4 **A Yes. The NFL has been well-aware of  
5 who we are for quite some time.**

6 Q And when you say "for quite some time,"  
7 how far back are you thinking?

8 **A Well, the NFL was instrumental in  
9 creating USA Football when we were created back in  
10 2002.**

11 Q And in terms of NFL knowing that  
12 USA Football is the national governing body for  
13 football in the United States, how far back do you  
14 believe that goes?

15 **A Since the first time we mentioned it.**

16 Q Do you know when that was?

17 **A I don't know specifically. I was not  
18 employed by USA Football prior to 2014.**

19 Q By the time you arrived at  
20 USA Football, had USA Football already been  
21 communicating to the NFL that it was the national  
22 governing body for football in the United States?

23 **A Yes.**

24 Q Do you know who Izell Reese is?

25 **A Yes.**

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1 Q Does Izell Reese know that USA Football  
2 is the national governing body for football in the  
3 United States?

4 **A I can assume so.**

5 Q And what do you base that assumption  
6 on?

7 **A Because we had to work with his company  
8 during the transition of NFL FLAG.**

9 Q And is his company RCX Sports?

10 **A I believe so. I believe they go by  
11 RC Sports now, but they've changed their name a few  
12 times.**

13 MR. NIELSEN: Yeah. Okay. For the  
14 reporter that's R-C-X, like the letters.

15 BY MR. NIELSEN:

16 Q And would Mr. Reese's knowledge of  
17 USA Football being the national governing body go  
18 back to, let's say, 2020?

19 **A It could 'cause that's when, I believe,  
20 the transition was taking place.**

21 Q Now, staying on the topic of national  
22 governing body and national governing body  
23 certification, Topic 26 in the notice, application  
24 papers for NGB certification have not -- the time  
25 has not come for them to be submitted yet, correct?



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1 Q And the flag football -- I think you've  
2 already testified to this, but flag football was  
3 added to the Olympic program when?

4 A For LA 2028.

5 Q And when was that decision made or  
6 announced by USOPC?

7 A Last fall.

8 Q So do I understand correctly then that  
9 prior to that time there was no flag football as an  
10 Olympic sport?

11 A Correct.

12 Q Is there any possibility in your mind  
13 that the NFL was unaware at any time whether or  
14 not -- or, let's say, in 2022, for example, whether  
15 or not flag football was an Olympic sport?

16 MR. NIELSEN: Objection to form and  
17 leading.

18 A No. You can look it up online as to  
19 what Olympic sports there are and aren't.

20 BY MS. RICCHIUTO:

21 Q Has anyone at the NFL ever expressed  
22 confusion or lack of clarity to USA Football about  
23 whether or not flag football was an Olympic sport  
24 in 2022?

25 MR. NIELSEN: Same objections.

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1 And what's today? Today's the 4th.

2 Can we get this by the 10th?

3 STENOGRAPHIC REPORTER: Sure.

4 MR. NIELSEN: Great.

5 MS. RICCHIUTO: And we will take an

6 Etrans. And we don't need -- I feel like I

7 didn't say correctly the last time, Bailey.

8 What we want is, like, we want to be able to

9 get video if we need video, but I don't need

10 the video, like, all synced up and

11 whiz-banged now.

12 Does that make sense?

13 THE VIDEOGRAPHER: Yes.

14 STENOGRAPHIC REPORTER: Do you also  
15 want it expedited for the 10th?

16 MS. RICCHIUTO: No, I don't think so.

17 (Deposition concluded at 4:57 p.m.)  
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1 A No.

2 MS. RICCHIUTO: That's all my  
3 questions.

4 MR. NIELSEN: Okay. Good. So subject  
5 to any discussions between counsel as to any  
6 of the topics, I think we're good as far as  
7 being done.

8 Anne, what was our agreement on the  
9 last -- I think we're going to rush the  
10 transcript, but if the transcript -- if  
11 changes aren't provided with a signature  
12 within 30 days, we'll deem it as signed with  
13 no changes.

14 MS. RICCHIUTO: That's fine. And we  
15 will want to read and sign.

16 MR. NIELSEN: Yeah.

17 THE VIDEOGRAPHER: This concludes  
18 today's deposition. The time is 4:55 p.m.  
19 We are off the record.

20 STENOGRAPHIC REPORTER: Okay. So can I  
21 have everyone state your order on the record  
22 if you're ordering the transcript, please?

23 MR. NIELSEN: Yes. We are ordering the  
24 transcript. We do not need video at this  
25 time, and we need that transcript rushed.

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# CERTIFICATE OF DEPONENT

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I hereby certify that I have read and  
examined the foregoing transcript, and the same is  
a true and accurate record of the testimony given  
by me.

Any additions or corrections that I  
feel are necessary will be made on the Errata  
Sheet.

JAMIE RILEY

DATE

(If needed, make additional copies of the Errata  
Sheet on the next page or use a blank piece of  
paper.)

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## ERRATA SHEET

1  
 2 Case: USA Football vs FFWCT; USA Flag, et al.  
 3 Witness: JAMIE RILEY Date: 4/4/2024  
 4  
 5 PAGE/LINE SHOULD READ REASON FOR CHANGE  
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1 State of Michigan  
 2 Washtenaw County to wit:  
 3  
 4 I, Christine A. Gonzalez, CSR, RPR, a  
 5 Notary Public of the State of Michigan, Washtenaw  
 6 County, do hereby certify that prior to the  
 7 commencement of the examination, the within-named  
 8 witness appeared via Zoom and was duly remotely  
 9 sworn by me to testify to the truth, the whole and  
 10 nothing but the truth.  
 11 I further certify that the examination  
 12 was recorded stenographically by me, and this  
 13 transcript is a record of the proceedings to the  
 14 best of my ability.  
 15 I further certify that I am not of  
 16 counsel to any of the parties, nor in any way  
 17 interested in the outcome of this action.  
 18 As witness my hand and notarial seal  
 19 this 10th of April, 2024.  
 20 *Christine Gonzalez*  
 21 \_\_\_\_\_  
 22 Christine A. Gonzalez, CSR, RPR  
 23 Notary Public - Washtenaw County  
 24  
 25 My Commission Expires: June 17, 2028